

**PLAINS**  
**MARKETING, L.P.**

November 14, 2014

**Via Fed Ex**

771866456398

Ms. Melinda Woodruff  
Department of Environmental Quality  
Tidewater Regional Office  
5636 Southern Boulevard  
Virginia Beach, Virginia 23462

**Re: VPDES Permit VA0003018  
VPDES Permit Renewal and Modification Application  
Plains Marketing L.P., Yorktown**

Dear Ms. Woodruff:

Enclosed are one hard copy and one electronic copy of an Application for the renewal and modification of Virginia Pollution Discharge Elimination System (VPDES) Permit No. VA0003018 issued to Plains Marketing, L.P., Yorktown ("Plains"). As you are aware, the facility was acquired by Plains on December 29, 2011 and now operates as a petroleum products terminal. The facility no longer operates the equipment used in petroleum refinery operations, and is in the process of dismantling that. This permit application is being provided to renew the existing permit and to propose modifications to support the operation of a new waste water treatment plant and outfall. The new system has been designed to provide effective treatment for the various wastewaters and contact stormwater generated on-site that are currently discharged to the Hampton Roads Sanitary District (HRSD) treatment plant or transported off-site for treatment. Evidence of payment of the appropriate fees for the request for modification is included with this Application.

Plains offers the following summary of some of the key issues associated with this Application:

**Facility and Permit Status Changes**

Petroleum refinery operations at the facility ceased in September 2010 and since that time, the facility has operated strictly as a petroleum products storage and terminal facility. Plains is requesting a modification to the permit status and classification of the facility. The SIC code has been modified from 2911 to both 4226 and 5171, as indicated on Form 1. The current VPDES permit provides a facility status of "Industrial Major". With the classification change, Plains is requesting that Virginia Department of Environmental Quality (DEQ) change the permit status to "Industrial Minor".

### **Proposed New Outfall**

The proposed new outfall will be numbered as Outfall #005 and will be located at end of the dock over the York River. The outfall will discharge various industrial wastewaters and stormwater runoff from contact areas. While most of these sources are intermittent and/or seasonal, it is expected that discharge from this outfall will be continuous throughout the year.

The new Wastewater Treatment Plant (WTP) will consist of primary oil removal, equalization, filtration, and adsorption of dissolved organics and metals that are expected to be present in the flows. The proposed compliance sampling point for the new outfall will be at the Micro-Floc Building previously used for internal Outfall #101. There will be no flow contributions or pipe connections to the proposed discharge downstream of the sampling point.

### **Operations & Maintenance Manual and Solids Management Plan**

The current permit includes requirements for a facility Operations & Maintenance (O&M) Plan, as well as a Solids Management Plan. These plans are no longer valid since the existing Water Treatment Plant and Activated Sludge Plant will no longer operate or discharge flow through a VPDES Permitted Outfall. A new O&M Plan and Solids Management Plan will be developed for the WTP to replace the existing plans.

### **Proposed Elimination of Outfalls**

Plains is requesting that Outfall #001, and internal Outfalls #101 and #102 be eliminated in conjunction with this permit renewal and modification. Internal Outfall # 101 was associated with the former refinery wastewater treatment plant, which is no longer in service and has been partially demolished. The refinery once-through cooling water system which previously discharged through internal Outfall #102 is no longer in service. With the discontinuation of the use of the once-through cooling water system, the discharge line for Outfall #001 was significantly over-sized for the needs of the terminal, and has been partially demolished.

### **Sampling Clarifications**

#### **Outfall #005:**

Because the new WTP has not yet been constructed, it is not yet possible to perform the sampling required to complete Form 2C.V.A-C. Per discussions during our pre-application meetings, Plains intends to perform the sampling following start-up of the new WTP. The table for Form 2C.V.A-C included with this application has been populated to indicate the parameters Plains believes will be appropriate for inclusion in that sampling effort.

Outfall #002:

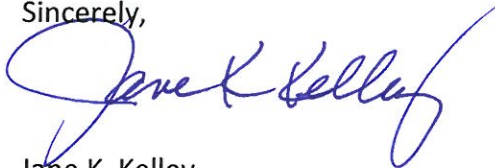
Plains began working with a contractor in the latter half of August to perform the sampling required for this stormwater outfall. Due to scheduling issues, the sampling was not performed in September, and there were no qualifying rain events in October. The contractor will attempt to collect the required samples during the next qualifying rain event. The analytes for sampling at this outfall are provided in Attachment 2F-VII.A – C of the Application. The results of the sampling, the laboratory reports, and the sampling summary required by Section 2F.D will be submitted as a supplement to this application as soon as that information is available.

Outfall #004:

The Outfall 004 discharge is comprised strictly of firewater and/or freeze-protection water, which consists solely of water from the City of Newport News and/or the York River. Therefore, Plains does not believe that sampling of this outfall is necessary.

Plains looks forward to continuing to work with you on the renewal and modification of the VPDES permit for our facility. If you have any questions regarding this matter, please do not hesitate to contact me at (757) 898-9732 or via e-mail ([jkelly@paalp.com](mailto:jkelly@paalp.com)).

Sincerely,



Jane K. Kelley  
EHS Manager

Enclosures